

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN SOUTHERN DISTRICT OF NEW YORK

----- x
GOVERNMENT EMPLOYEES INSURANCE COMPANY,
GEICO INDEMNITY COMPANY, GEICO GENERAL
INSURANCE COMPANY, and GEICO CASUALTY
COMPANY,

Plaintiffs,

Docket No.

17-cv-02802

-against-

IGOR MAYZENBERG, MINGMEN ACUPUNCTURE, P.C.,
SANLI ACUPUNCTURE, P.C., and
JOHN DOE DEFENDANTS "1"-"10"

Defendants.

----- x
Reporter's Ink, Corp.

926 RXR Plaza

Uniondale, New York

March 9, 2018

10:50 a.m.

CONTINUED ON NEXT PAGE:



1

2 Deposition of EGOR DOVMAN, the Non-Party
3 Witness, taken by the Plaintiffs, in the
4 above-entitled action, held at the above time
5 and place, pursuant to Subpoena, taken before
6 AMY BOGUSZEWSKI, a shorthand reporter and
7 Notary Public within and for the State of New
8 York.

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1 E. DOVMAN

2 to answer your question.

3 Q. How much has Sanli Acupuncture paid
4 companies that you are associated with?

5 A. On the advice of counsel, I invoke
6 my Fifth Amendment privilege against
7 self-incrimination, and respectfully decline
8 to answer your question.

9 Q. Why did Sanli Acupuncture pay AC
10 Billing & Collections \$6,200 on October 7,
11 2016?

12 A. On the advice of counsel, I invoke
13 my Fifth Amendment privilege against
14 self-incrimination, and respectfully decline
15 to answer your question.

16 Q. Did AC Billing & Collections
17 actually provide any billing or collection
18 services to Sanli Acupuncture, P.C.?

19 A. On the advice of counsel, I invoke
20 my Fifth Amendment privilege against
21 self-incrimination, and respectfully decline
22 to answer your question.

23 Q. Did Sanli Acupuncture, P.C. pay AC
24 Billing & Collections in exchange for you
25 causing a patient to be referred to Sanli



1 E. DOVMAN

2 Acupuncture?

3 A. On the advice of counsel, I invoke
4 my Fifth Amendment privilege against
5 self-incrimination, and respectfully decline
6 to answer your question.

7 Q. Why did Sanli Acupuncture write six
8 checks to Best AC Medical Supply, Inc.?

9 A. On the advice of counsel, I invoke
10 my Fifth Amendment privilege against
11 self-incrimination, and respectfully decline
12 to answer your question.

13 Q. Did Best AC Medical Supply, Inc.
14 ever provide any medical supplies to Sanli
15 Acupuncture?

16 A. On the advice of counsel, I invoke
17 my Fifth Amendment privilege against
18 self-incrimination, and respectfully decline
19 to answer your question.

20 Q. How about to Igor Mayzenberg?

21 A. On the advice of counsel, I invoke
22 my Fifth Amendment privilege against
23 self-incrimination, and respectfully decline
24 to answer your question.

25 Q. Did Sanli Acupuncture pay Best AC



1 E. DOVMAN

2 Medical Supply in exchange for you causing
3 patients to be referred to Sanli Acupuncture?

4 **A. On the advice of counsel, I invoke**
5 **my Fifth Amendment privilege against**
6 **self-incrimination, and respectfully decline**
7 **to answer your question.**

8 Q. Were these payments kickbacks?

9 A. **On the advice of counsel, I invoke**
10 **my Fifth Amendment privilege against**
11 **self-incrimination, and respectfully decline**
12 **to answer your question.**

13 MR. HENESY: I want to rephrase
14 that question and I will consent to
15 strike because it was an improper
16 question.

17 Q. Were the payments made by Sanli
18 Acupuncture to Best AC Medical Supply made as
19 kickbacks?

20 A. **On the advice of counsel, I invoke**
21 **my Fifth Amendment privilege against**
22 **self-incrimination, and respectfully decline**
23 **to answer your question.**

24 Q. Why did Sanli Acupuncture write
25 eleven checks to Del Business Supply?



1

E. DOVMAN

2

Q. Did Sanli Acupuncture pay DSJ

3

Consulting in exchange for you causing

4

patients to be referred to Sanli Acupuncture?

5

A. On the advice of counsel, I invoke

6

my Fifth Amendment privilege against

7

self-incrimination, and respectfully decline

8

to answer your question.

9

Q. Were the payments from Sanli

10

Acupuncture to DSJ Consulting kickbacks?

11

A. On the advice of counsel, I invoke

12

my Fifth Amendment privilege against

13

self-incrimination, and respectfully decline

14

to answer your question.

15

Q. Why did Sanli Acupuncture write

16

three checks to Geiovan Consulting?

17

A. On the advice of counsel, I invoke

18

my Fifth Amendment privilege against

19

self-incrimination, and respectfully decline

20

to answer your question.

21

Q. Did Geiovan Consulting ever provide

22

consulting services to Sanli Acupuncture?

23

A. On the advice of counsel, I invoke

24

my Fifth Amendment privilege against

25

self-incrimination, and respectfully decline



1 E. DOVMAN

2 to answer your question.

3 Q. Did Sanli Acupuncture pay Geiovan
4 Consulting in exchange for you causing
5 patients to be referred to Sanli Acupuncture?

6 A. On the advice of counsel, I invoke
7 my Fifth Amendment privilege against
8 self-incrimination, and respectfully decline
9 to answer your question.

10 Q. Did Sanli Acupuncture make payments
11 to DSJ Consulting in exchange for you causing
12 patients to be referred to any health care
13 provider?

14 A. On the advice of counsel, I invoke
15 my Fifth Amendment privilege against
16 self-incrimination, and respectfully decline
17 to answer your question.

18 Q. Did Sanli Acupuncture pay Geiovan
19 Consulting in exchange for you causing
20 patients to be referred to Mingmen
21 Acupuncture Services?

22 A. On the advice of counsel, I invoke
23 my Fifth Amendment privilege against
24 self-incrimination, and respectfully decline
25 to answer your question.



1 E. DOVMAN

2 Q. Were the payments from Sanli
3 Acupuncture to Geiovan Consulting kickbacks?

4 A. On the advice of counsel, I invoke
5 my Fifth Amendment privilege against
6 self-incrimination, and respectfully decline
7 to answer your question.

8 Q. Why did Sanli Acupuncture write
9 checks to Green BH, Inc.?

10 A. On the advice of counsel, I invoke
11 my Fifth Amendment privilege against
12 self-incrimination, and respectfully decline
13 to answer your question.

14 Q. Did Green BH, Inc. ever actually
15 provide any services to Sanli Acupuncture?

16 A. On the advice of counsel, I invoke
17 my Fifth Amendment privilege against
18 self-incrimination, and respectfully decline
19 to answer your question.

20 Q. Did Sanli Acupuncture make payments
21 to Green BH, Inc. in exchange for you causing
22 patients to be referred to Sanli Acupuncture?

23 A. On the advice of counsel, I invoke
24 my Fifth Amendment privilege against
25 self-incrimination, and respectfully decline



1 E. DOVMAN

2 to answer your question.

3 Q. Did Sanli Acupuncture make payments
4 to Green BH, Inc. in exchange for you causing
5 patients to be referred to Mingmen
6 Acupuncture?

7 A. On the advice of counsel, I invoke
8 my Fifth Amendment privilege against
9 self-incrimination, and respectfully decline
10 to answer your question.

11 Q. Were the payments from Sanli
12 Acupuncture to Green BH kickbacks?

13 A. On the advice of counsel, I invoke
14 my Fifth Amendment privilege against
15 self-incrimination, and respectfully decline
16 to answer your question.

17 Q. Why did Sanli Acupuncture make
18 payments to JER Advertising & Consulting?

19 A. On the advice of counsel, I invoke
20 my Fifth Amendment privilege against
21 self-incrimination, and respectfully decline
22 to answer your question.

23 Q. Did JER Advertising & Consulting
24 ever actually provide advertising and/or
25 consulting services to anyone?



1 E. DOVMAN

2 A. On the advice of counsel, I invoke
3 my Fifth Amendment privilege against
4 self-incrimination, and respectfully decline
5 to answer your question.

6 Q. Were the payments from Sanli
7 Acupuncture to JER Advertising & Consulting
8 in exchange for you causing patients to be
9 referred to Mingmen Acupuncture?

10 A. On the advice of counsel, I invoke
11 my Fifth Amendment privilege against
12 self-incrimination, and respectfully decline
13 to answer your question.

14 Q. Were the payments from Sanli
15 Acupuncture to JER Advertising & Consulting
16 kickbacks?

17 A. On the advice of counsel, I invoke
18 my Fifth Amendment privilege against
19 self-incrimination, and respectfully decline
20 to answer your question.

21 Q. Why did Sanli Acupuncture make
22 payments to Kornell Plus, Inc.?

23 A. On the advice of counsel, I invoke
24 my Fifth Amendment privilege against
25 self-incrimination, and respectfully decline



1 E. DOVMAN

2 to answer your question.

3 . Q. To Igor Mayzenberg?

4 A. On the advice of counsel, I invoke
5 my Fifth Amendment privilege against
6 self-incrimination, and respectfully decline
7 to answer your question.

8 Q. To Sanli Acupuncture?

9 A. On the advice of counsel, I invoke
0 my Fifth Amendment privilege against
1 self-incrimination, and respectfully decline
2 to answer your question.

13 Q. Were the payments from Sanli to
14 Kornell Plus kickbacks?

15 A. On the advice of counsel, I invoke
16 my Fifth Amendment privilege against
17 self-incrimination, and respectfully decline
18 to answer your question.

19 Q. Why did Sanli Acupuncture make
20 payments to Krik Medical Testing?

21 A. On the advice of counsel, I invoke
22 my Fifth Amendment privilege against
23 self-incrimination, and respectfully decline
24 to answer your question.

25 Q. Did Krik Medical Testing ever



1 E. DOVMAN

2 provide any medical testing services to
3 anyone?

4 A. On the advice of counsel, I invoke
5 my Fifth Amendment privilege against
6 self-incrimination, and respectfully decline
7 to answer your question.

8 Q. Were the payments from Sanli
9 Acupuncture to Krik Medical Testing in
10 exchange for you causing patients to be
11 referred to Mingmen Acupuncture?

12 A. On the advice of counsel, I invoke
13 my Fifth Amendment privilege against
14 self-incrimination, and respectfully decline
15 to answer your question.

16 Q. Were the payments from Sanli
17 Acupuncture to Krik Medical Testing
18 kickbacks?

19 A. On the advice of counsel, I invoke
20 my Fifth Amendment privilege against
21 self-incrimination, and respectfully decline
22 to answer your question.

23 Q. Why did Sanli Acupuncture make
24 payments to MN Surgical Supply?

25 A. On the advice of counsel, I invoke



1 E. DOVMAN

2 my Fifth Amendment privilege against
3 self-incrimination, and respectfully decline
4 to answer your question.

5 Q. Why did Sanli Acupuncture make
6 payments to ML Garbage Removal?

7 A. On the advice of counsel, I invoke
8 my Fifth Amendment privilege against
9 self-incrimination, and respectfully decline
10 to answer your question.

11 Q. Has ML Garbage Removal ever provided
12 garbage removal services to anyone?

13 A. On the advice of counsel, I invoke
14 my Fifth Amendment privilege against
15 self-incrimination, and respectfully decline
16 to answer your question.

17 Q. Were the payments from Sanli
18 Acupuncture to ML Garbage Removal in exchange
19 for you causing patients to be referred to
20 Igor Mayzenberg?

21 A. On the advice of counsel, I invoke
22 my Fifth Amendment privilege against
23 self-incrimination, and respectfully decline
24 to answer your question.

25 Q. Or to Mingmen Acupuncture?



1 E. DOVMAN

2 MR. HENESY: Off the record.

5 MR. HENESY: We had a
6 discussion off the record and counsel
7 and I have agreed that I have a
8 number of questions regarding
9 additional entities and potential
10 financial transactions between
11 certain companies. And it's the same
12 series of questions that I have been
13 asking with regard to payments made
14 from Sanli Acupuncture to various
15 companies. What I would like to do
16 is read this into the record, this
17 list of companies and at the end of
18 it, ask questions about the list in
19 bulk as opposed to asking them
20 individually; this list over 50
21 companies long. So Counsel, with
22 your consent, I am going to
23 essentially compound questions into
24 maybe three or four questions about
25 an entire list.



1 E. DOVMAN

2 MR. SASSON: That's okay.

9 MR. SASSON: Fair.

10 MR. HENESY: Here's the list:

11 A. Baldonado Medical, PC

12 AC Medical, PC

13 Advance Rehab Care PT, PC

14 Ahava, A-H-A-V-A, Medical Diagnostic, PC

15 All About Physical Therapy, PC

16 Ambel, A-M-B-E-L, Acupuncture, PC

17 Anni, A-N-N-I, Chiropractic, PC

18 Arwa, A-R-W-A, Physical Therapy, PC

19 **ATV Rehab, PT, PC**

20 Avenue I Medical, PC

21 Belam, B-E-L-A-M, Acupuncture, PC

22 **Bella, B-E-L-L-A, Pharmacy**

23 Best Care Rehab PT, PC

24 BSS Medical, PC

25 Chiropractic Diagnostic, PC



1 E. DOVMAN
2 Dignity PT, PC
3 Ditmas, D-I-T-M-A-S, Primary Medical Care, PC
4 Dot, D-O-T, Med Equipment
5 East Flatbush Medical, PC
6 Easy Living Occupational Therapy, PC
7 El, E-L, Sanaa, S-A-N-A-A, PT, PC
8 Enterprise Health Products, Incorporated
9 Hand By Hand PT, PC
10 Hands Of Hope PT, PC
11 Healthcraft PT, PC
12 Health Way Rehabilitation PT, PC
13 Healthy Living Medical & Surgical Products,
14 Incorporated
15 JB Chiropractic Services, PC
16 Lana, L-A-N-A, Massage Therapy, PC
17 Lexington Medical Diagnostic Services, PC
18 LN Medical Diagnostic, PC
19 Lomis, L-O-M-I-S, Acupuncture, PC
20 Manhattan's Hands of Hope, PC
21 PT Access, PC
22 Palo, P-A-L-O, Physical Therapy &
23 Rehabilitation, PC
24 QB Acupuncture, PC
25 Quantum Rehab Physical Therapy, PC



1 E. DOVMAN

2 Right Choice Physical Therapy, PC

3 SPE Chiropractic, PLLC

4 Sheepshead Bay Medical Supply, Inc.

5 Stark Medical Supply, Inc.

6 Sung Chiropractic, PC

7 SY Wellness Massage Therapy, PC

8 Tender Touch Rehab OT, PC

9 Trim Medical Services, PC

0 Ultimate Care Physical Therapy, PC

1 Voorhies, V-O-O-R-H-I-E-S, Health Products,
2 Inc.

3 VP Chiropractic Adjustment, PC

4 Who, W-H-O, Acupuncture, PC

5 Wisdom Physical Therapy, PC

6 Zarkad, Z-A-R-K-A-D, Medical, PC

19 MR. SASSON: No.

20 Q. Mr. Dovman, my question is, any of
21 the companies I just mentioned, why did those
22 companies pay companies that you're
23 associated with money?

24 A. On the advice of counsel, I invoke
25 my Fifth Amendment privilege against



1 E. DOVMAN

2 self-incrimination, and respectfully decline
3 to answer your question.

4 Q. Did you or any company you're
5 associated with ever provide any actual
6 services to any of those companies?

7 A. On the advice of counsel, I invoke
8 my Fifth Amendment privilege against
9 self-incrimination, and respectfully decline
10 to answer your question.

11 Q. Did those companies I just mentioned
12 pay you or companies you're associated with
13 money in exchange for you causing patients to
14 be referred to those companies I mentioned?

15 A. On the advice of counsel, I invoke
16 my Fifth Amendment privilege against
17 self-incrimination, and respectfully decline
18 to answer your question.

19 Q. Were the payments you received from
20 the companies I just mentioned kickbacks?

21 A. On the advice of counsel, I invoke
22 my Fifth Amendment privilege against
23 self-incrimination, and respectfully decline
24 to answer your question.

25 Q. Have you in the last seven years



1 E. DOVMAN

2 ever paid money to anyone in exchange for
3 access to a motor vehicle accident victim?

4 A. On the advice of counsel, I invoke
5 my Fifth Amendment privilege against
6 self-incrimination, and respectfully decline
7 to answer your question.

8 Q. Do you broker patients between
9 personal injury lawyers and health care
10 providers?

11 A. On the advice of counsel, I invoke
12 my Fifth Amendment privilege against
13 self-incrimination, and respectfully decline
14 to answer your question.

15 Q. Did you work with Alexander Almonte
16 to incorporate companies using false names on
17 the Certificate of Incorporation?

18 A. On the advice of counsel, I invoke
19 my Fifth Amendment privilege against
20 self-incrimination, and respectfully decline
21 to answer your question.

22 Q. Have you in the last seven years
23 ever entered into an agreement with a body
24 shop whereby they referred you patients?

25 A. On the advice of counsel, I invoke



E. DOVMAN

2 my Fifth Amendment privilege against
3 self-incrimination, and respectfully decline
4 to answer your question.

5 Q. Have you ever paid money to a body
6 shop or any individual associated with a body
7 shop in exchange for access to patients?

8 A. On the advice of counsel, I invoke
9 my Fifth Amendment privilege against
10 self-incrimination, and respectfully decline
11 to answer your question.

12 Q. Did you incorporate a series of
13 companies in order to conceal a kickback
14 and/or a patient-brokering scheme?

15 A. On the advice of counsel, I invoke
16 my Fifth Amendment privilege against
17 self-incrimination, and respectfully decline
18 to answer your question.

19 Q. Do you have access to any account
20 held in the name of Daniel Corley?

21 A. On the advice of counsel, I invoke
22 my Fifth Amendment privilege against
23 self-incrimination, and respectfully decline
24 to answer your question.

25 Q. When I say account, I mean bank



1 E. DOVMAN

2 account?

3 A. On the advice of counsel, I invoke
4 my Fifth Amendment privilege against
5 self-incrimination, and respectfully decline
6 to answer your question.

7 Q. Does your wife have access to any
8 bank account in the name of Daniel Corley?

9 A. On the advice of counsel, I invoke
10 my Fifth Amendment privilege against
11 self-incrimination, and respectfully decline
12 to answer your question.

13 Q. Do you notify Daniel Corley about
14 the payments you make out of his bank
15 account?

16 A. On the advice of counsel, I invoke
17 my Fifth Amendment privilege against
18 self-incrimination, and respectfully decline
19 to answer your question.

20 Q. Does your wife notify Daniel Corley
21 about the payments you make out of his bank
22 account?

23 A. On the advice of counsel, I invoke
24 my Fifth Amendment privilege against
25 self-incrimination, and respectfully decline

